

ENDORSED  
First Judicial District Court

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STATE OF NEW MEXICO  
COUNTY OF SANTA FE  
FIRST JUDICIAL DISTRICT COURT

JAN 19 2016

Santa Fe, Rio Arriba &  
Los Alamos Counties  
PO Box 2268  
Santa Fe, NM 87504-2268

DAKOTA CLAY AHLGRIM,  
Plaintiff,

No. D-101-CV-2016-00126  
COMPLAINT/CIVIL

v.

KEEFE GROUP,  
Defendant.

### I. NATURE OF THE ACTION

1.) This is a civil action authorized by the Constitution and Laws of the State of New Mexico, by a Citizen of the State of New Mexico who seeks declaratory and injunctive relief, as well as monetary damages for the following:

a.) FALSE ADVERTISEMENT and/or FALSE PROMOTION;

b.) PRICE DISCRIMINATION;

c.) PRICE FIXING;

d.) UNJUST ENRICHMENT;

e.) CLAYTON ACT VIOLATIONS;

f.) ADVERTANT NEGLIGENCE;

### II. STATEMENT OF JURISDICTION

2.) The Court has Jurisdiction in civil actions pursuant to the provisions of Article 6 Section 13 of the New Mexico Constitution. Plaintiff has previously effectuated Notice upon Defendant.

### III. PARTIES TO SUIT

3.) Plaintiff is Dakota Clay Ahlgrim, a Citizen of the State of New Mexico. He is and was at all times mentioned herein in the custody of the New Mexico Corrections Department and confined at the Penitentiary of New Mexico, Level Six Super-maximum security facility in Santa Fe, New Mexico.

4.) Defendant is Keefe Group, an Approved Vendor contracted to provide canteen services to New Mexico Corrections Department Prisoners. Its principal place of business is St. Louis, MO.